

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-cv-06563-LJL;  
24-mc-00353-LJL

**DECLARATION OF  
KENNETH A. CARUSO**

KENNETH A. CARUSO hereby declares, pursuant to 28 U.S.C. § 1746:

1. I am a member of the Bar of this Court and the sole member of Kenneth Caruso Law LLC. I am lead counsel for Defendant, Rudolph W. Giuliani (“Defendant”), in both 24-cv-06563-LJL (the “Homestead Action”) and 24-mc-00353-LJL (the “Turnover Proceeding”).

2. I submit this Declaration in compliance with the Court’s Order (Homestead Action ECF 85, Turnover Proceeding ECF 117) (the “Order”), which requires that “attorneys Caruso and Labkowski shall promptly serve a copy of this Order on Defendant, by express mail and email, and shall file a proof of service on ECF.”

3. Immediately after the Court entered the Order, I served a copy of it on Defendant via email.

4. Mr. Labkowski informed me that, last night, he sent a copy of the Order to Defendant via FedEx overnight delivery.

5. Upon reviewing the FedEx tracking number, 779966880515, I confirmed that the Order was delivered to Defendant, today, at 10:52 am.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on November 15, 2024

By: /s/ Kenneth A. Caruso  
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*Attorneys for Defendant,  
Rudolph W. Giuliani*